

BlockFi Inc., and its debtor affiliates (collectively, “BlockFi” or the “Wind-Down Debtors”), as managed by the Plan Administrator in the above-referenced Chapter 11 cases (the “Chapter 11 Cases”), hereby submit this *Response to Objection to Fourth Notice of Satisfaction of Claims* (the “Response”) requesting that this Court deny the *Objection to Fourth Notice of Satisfaction of Claims* (the “Objection”) [Docket No. 2365]. In support of this Response, the Wind-Down Debtors respectfully state as follows:

RESPONSE

1. On July 25, 2024, the Wind Down Debtors filed the *Fourth Notice of Satisfaction of Claims* (the “Fourth Notice”) [Docket No. 2358] in compliance with and according to the *Order Granting Debtors’ Motion for Entry of an Order (A) Approving the (I) Omnibus Claims Objection Procedures and Form of Notice, (II) Omnibus Substantive Claims Objections, and (III) Satisfaction Procedures and Form of Notice, (B) Waiving Bankruptcy Rule 3007(e), and (C) Granting Related Relief* (the “Claims Objection Procedures Order”) [Docket No. 609].

2. As set forth in the Fourth Notice, the Wind-Down Debtors determined that two scheduled claims identified on Schedule 1 attached thereto have been satisfied in full and no amounts are owed by the Wind-Down Debtors to these claimants.

3. The Fourth Notice is scheduled to be heard on August 15, 2024, at 11:30 a.m. ET and sets a deadline to respond of August 8, 2024, at 4:00 p.m. ET.

4. On August 9, 2024, George Wynns filed the Objection. Setting aside the untimely nature of Mr. Wynns’ Objection, Mr. Wynns is not one of the two claimants whose claims are identified on Schedule 1 of the Fourth Notice, and his claim is otherwise in no way implicated by the Fourth Notice. Rather, Mr. Wynns’ Objection reiterates his position with respect to the treatment of his claim, which treatment remains subject to ongoing appeal before the District

Court. In other words, Mr. Wynns Objection has no applicability to the Fourth Notice, and the Wind-Down Debtors respectfully request that the Objection be overruled.

NOTICE

5. The Wind-Down Debtors will provide notice of this Motion to the following parties and/or their respective counsel, as applicable: (a) the office of the U.S. Trustee for the District of New Jersey, and (b) George S. Wynns.

CONCLUSION

Wherefore, the Wind-Down Debtors respectfully request that the Court deny the Objection and grant such other relief as is just and proper.

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Dated: August 12, 2024

/s/ Daniel M. Stolz

GENOVA BURNS LLC

Daniel M. Stolz, Esq.
Donald W. Clarke, Esq.
110 Allen Rd., Suite 304
Basking Ridge, NJ 07920
(973) 230-2095
dstolz@genovaburns.com
dclarke@genovaburns.com

Local Counsel to the Plan Administrator

HAYNES AND BOONE, LLP

Richard S. Kanowitz, Esq. (NJ Bar No. 047911992)
Lauren M. Sisson, Esq. (NJ Bar No. 394182022)
30 Rockefeller Plaza, 26th Floor
New York, New York 10112
(212) 659-7300
richard.kanowitz@haynesboone.com
lauren.sisson@haynesboone.com

Attorneys for the Plan Administrator

BROWN RUDNICK LLP

Kenneth J. Aulet, Esq. (admitted *pro hac vice*)
Seven Times Square
New York, New York 10036
(212) 209-4800
kaulet@brownrudnick.com

BROWN RUDNICK LLP

Tristan Axelrod, Esq. (admitted *pro hac vice*)
One Financial Center
Boston, MA 02111
(617)856-8300
taxelrod@brownrudnick.com

General Counsel to the Plan Administrator